

**From:** [Craig Ziady](#)  
**To:** [Casey, Carolyn](#)  
**Cc:** [Zucker, Audrey](#); [Wainberg, Daniel](#); [Bruce Hoskins](#); [Murphy, Jim](#); [Steve Drohosky](#)  
**Subject:** RE: Cummings Center, Beverly - draft letter etc.  
**Date:** Thursday, December 06, 2018 3:37:44 PM  
**Attachments:** [LetterSJD Aspire 12.2018 v5.docx](#)  
[LetterSJD Aspire 12.2018 v5RED.pdf](#)

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Hi Carolyn – Thank you for your further thoughts on the proposed letter. We have incorporated nearly all of them in the enclosed (final?) draft. We have also attached a redlined version that tracks the changes from your most recent draft. Please confirm that the enclosed letter is approved. With regard to the follow-up air sampling at Suites 135-C and 140-A that we referenced in our November 20 correspondence, we would like to proceed with such work on Friday, December 14 or Monday, December 17. Do you have a preference for either date? Finally, due to the unexpected passing of Bruce's father this week, Bruce is going to be out of town for several days. May we please have an extension of one week for our monthly progress report? We will deliver same on or before December 21, 2018. Thank you in advance.

Regards,

Craig

*Craig J. Ziady*

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**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Wednesday, November 21, 2018 11:34 AM

**To:** Craig Ziady

**Cc:** Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Murphy, Jim

**Subject:** RE: Cummings Center, Beverly - draft letter etc.

Just an FYI - If you move ahead with this additional PCB work without an EPA approved WP/QAPP, it will be at your own risk. I have not yet been able to discuss the PCB issues with our TSCA expert. I hope to next week. One concern is that the sampling locations needed to be changed for convenience. Would you anticipate more elevated concentrations if the samples had not been modified? Certainly this schedule is not allowing for the minimum notice requirements for field work.

We have not yet reviewed the response to comments and revised risk assessment but that should not impact the collection of additional IDA samples as a follow-up to the HVAC modifications. Can you provide some specifics on exactly what was done to improve the HVAC system. I did not see this in the progress report or the IRA status report.

Also, a revised version of the draft letter is attached. Sorry for all the additional changes but there were some very long sentences that I thought needed modification and other simplification as well. Thanks and Happy Thanksgiving to all!

Carolyn J. Casey  
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**From:** Craig Ziady <[craig@cummings.com](mailto:craig@cummings.com)>  
**Sent:** Tuesday, November 20, 2018 3:38 PM  
**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>  
**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>;  
Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Steve Drohosky <[sjd@cummings.com](mailto:sjd@cummings.com)>  
**Subject:** RE: Cummings Center, Beverly - draft letter

Hi Carolyn – Thank for your message. Please see revised draft of letter attached.

Also, as mentioned in the letter, we are in the process of arranging for follow-up air sampling at Suites 135-C and 140-A, as well as additional PCB sampling in the vicinity of FSLPCB-5, which we would like to complete within the next couple of weeks. It has been challenging to reach the necessary parties and coordinate around the holiday, but I hope to be able to confirm dates and times (and notify you of same) on Monday.

Thank you.

Happy Thanksgiving!

Regards,

Craig

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**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]  
**Sent:** Monday, November 19, 2018 2:05 PM  
**To:** Craig Ziady  
**Cc:** Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Steve Drohosky  
**Subject:** RE: Cummings Center, Beverly - draft letter

Could you please revise the third paragraph and resubmit a draft as soon as possible, and no longer than 14 days. It is assumed this is a quick fix and would not need 14 days. The risk assessment does **not** state that a condition of no significant risk was determined for suite 135C. Refer to table 12 which indicates, with a hazard index greater than 1, that a condition of no significant risk has not been achieved. Note that the paragraph (below) in the risk assessment where this information came from only states that there is a condition of no significant risk for the other suites.

In summary, the location with the overall highest level of risk was in Building 100 Suite 135-C

where nearly all scenarios had cancer and non-cancer risk levels above maximum allowable levels; the exception being cancer risk using MassDEP factors.

In contrast, the child day care scenarios for Building 100 Suites 149-J and 158-D and Building 600 171-X had acceptable cancer and non-cancer risk whether EPA or MassDEP factors were used (the exceptions were Suite 158-D cancer risk using EPA factors and Suite 171-X cancer risk using EPA factors when non-detect compounds were included). If only MassDEP factors were used, then a Condition of No Significant Risk would be concluded for the child care scenario (i.e., current use) for these Suite locations. The most conservative scenario (residential including non-detect compounds) would result in a significant risk for cancer using both EPA and MassDEP factors for all locations, including the outdoor air.

Thanks

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**From:** Craig Ziady <[craig@cummings.com](mailto:craig@cummings.com)>

**Sent:** Friday, November 09, 2018 5:08 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Steve Drohosky <[sjd@cummings.com](mailto:sjd@cummings.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>

**Subject:** Cummings Center, Beverly - draft letter

Carolyn – Further to your email below, please find enclosed a draft letter from the LSP of record to the property owner/manager. As with the prior correspondence, this letter will be forwarded by Mr. Drohosky to the owner/operator of Suite 135-C.

We have not yet prepared a similar letter regarding Suite 171-X as the risk assessment concluded a condition of no significant risk for daycare use there, and no new sampling has been performed (or is planned). Accordingly, no meaningful update exists.

Please let me know if you have any questions.

Thanks,

Craig

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**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Friday, October 26, 2018 2:41 PM

**To:** Craig Ziady

**Cc:** Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Steve Drohosky

**Subject:** RE: Former USM facility schedule approval

Craig, It's our understanding that it has been about 3 months since any communication with the day-care managers (other than for access) has taken place. In the interest of keeping them informed and maintaining communication, could you please provide us with a draft letter for suite 135C in bldg. 100 and suite 171X in building 600 which (1) summarizes the latest sampling results, (2) your interpretations thereof, and (3) provides the next steps in the IDA contamination evaluation/mitigation process? Alternatively, if you believe that it would be preferable to schedule follow-up conference calls (including Cummings, EPA, and the daycare provider), please provide us with this same information in the form of a proposed summary of information that you would provide for suite 135C and suite 171X. Please send me your draft letters or summaries by November 9<sup>th</sup> at the latest.

I'd like to hold off on providing further information to the other 2 suites in building 100 until we have had further discussions concerning these suites.

Thank you,

Carolyn

Carolyn J. Casey

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**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Tuesday, October 09, 2018 5:14 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>;

Miano, John (DEP) <[john.miano@state.ma.us](mailto:john.miano@state.ma.us)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Steve

Drohosky <[sjd@cummings.com](mailto:sjd@cummings.com)>

**Subject:** Former USM facility

Hi Carolyn – Hope you had a good long weekend.

Further to your recent communications, please find enclosed the following:

1. Revised schedule of remaining tasks;
2. Cummings Properties' Response to EPA's Technical Review comments on August 14, 2018 Initial Site Risk Characterization; and
3. Revised Initial Site Risk Characterization, dated October 9, 2018.

Please let me know if you have any questions.

Thank you.

Craig

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